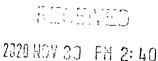


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APPLICATION OF SOUTHWESTERN ELECTRIC POWER COMPANY FOR AUTHORITY TO CHANGE RATES	§ § §	FORUBLIC WITH ITY CLESS FOR POSSION OF TEXAS

EAST TEXAS SALT WATER DISPOSAL COMPANY'S MOTION TO INTERVENE

East Texas Salt Water Disposal Company and East Texas Oil and Gas Producers¹ (collectively, "ETSWD"), pursuant to the Public Utility Regulatory Act ("PURA"), TEX. UTIL. CODE ANN. §§ 11.001 et seq., and §§ 22.102, 22.103(b), and 22.104 of the Commission's Rules of Practice and Procedures, files this Motion to Intervene in the above-referenced proceeding, respectfully showing as follows:

1. The names, address, and telephone number of ETSWD's authorized representatives are:

Todd F. Kimbrough Texas Bar No. 24050878 Dane McKaughan Texas Bar No. 24007651 HOLLAND & KNIGHT, LLP 111 Congress Ave. Suite 540 Austin, Texas 78701

Telephone: (512) 954-6520 Fax: (512) 472-7473

Email: todd.kimbrough@hklaw.com
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P. J. (Pat) Nault President/CEO East Texas Salt Water Disposal Co. 1209 Industrial Blvd. Kilgore, Texas 75662 Telephone: (903) 984-3063

Fax: (903) 986-8913 Email: pnault@etswd.com

All pleadings and other documents should be served upon ETSWD's authorized representatives.

2. On October 14, 2020, Southwestern Electric Power Company ("SWEPCO") filed an application for authority to change rates.

East Texas Oil and Gas Producers includes the following: BASA Resources, Inc., John Linder Operating Co. LLC; Falcon Resources, Inc.; R2Q Operating, LLC; and 4-Sight Operating Co. Ltd.



3. ETSWD is an industrial consumer of electricity in the Kilgore, Texas area and purchases electricity from SWEPCO. ETSWD's electric rates will be affected by the outcome of this proceeding.

4. ETSWD operates facilities for oil and gas producers in the East Texas oil field known as the Woodbine formation.

5. Because ETSWD owns and operates facilities in the SWEPCO service territory and purchases electricity from SWEPCO, ETSWD will be impacted by any determinations the Commission may make regarding SWEPCO's application.

For the above stated reasons, ETSWD respectfully requests that the Commission grant this Motion to Intervene and admit ETSWD as an intervenor in this proceeding for all purposes, and for such other relief to which it may be justly entitled.

Respectfully submitted,

/s/ Todd F. Kimbrough
Todd F. Kimbrough
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Texas Bar No. 24007651
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ATTORNEYS FOR EAST TEXAS SALT WATER DISPOSAL COMPANY

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document was served by email, facsimile, hand-delivery, overnight delivery, or 1st Class U.S. Mail on all parties of record in this proceeding on November 30, 2020.

/s/ Todd F. Kimbrough
Todd F. Kimbrough